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January 7, 2019

**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Judge  
United States District Court for the  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: *Khaled v. Bordenave*, No. 18 Civ. 5187 (PAE)(DF)

Dear Judge Engelmayer:

We represent Defendant Business Moves Consulting Inc. d/b/a/ Business Moves. Please note that Defendant Curtis Bordenave has notified us that he no longer consents to be represented by the same firm representing Business Moves and indicated that we no longer represent him in this action. We are in the process of preparing papers to formalize his instructions.

We write jointly with counsel for Plaintiffs Khaled M. Khaled ("Khaled") and ATK Entertainment, Inc. ("ATK") (collectively "Plaintiffs") to request a three (3) month extension of the discovery deadlines in this case. This is the first request for an extension of the discovery deadlines. The parties have exchanged written discovery and responses thereto. The parties have collected paper and electronic documents from their clients and are preparing to exchange documents electronically. The parties have also entered into a Stipulated Protective Order and conducted a settlement conference with Magistrate Freeman.

The Honorable Paul A. Engelmayer

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The current and proposed discovery deadlines are presented below. Upon approval by the Court, the parties will submit an updated Case Management Plan and Scheduling Order.

The next Case Management Conference is set for Friday, February 22, 2019, at 10:30 am.

Activity	Current Deadline	Proposed Deadline
All fact discovery completed by	January 23, 2019	April 26, 2019
Depositions to be completed by	January 23, 2019	April 26, 2019
Request to admit to be served by	December 7, 2018	March 8, 2019
All expert discovery completed by	March 9, 2019	June 10, 2019

Respectfully submitted,

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